

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACK STEPHEN PURSLEY,

Defendant.

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Case 4:18-cr-00575

**DEFENDANT’S RESPONSE TO GOVERNMENT’S NOTICE  
OF PROPOSAL FOR DIGITAL PRESENTATION AT TRIAL**

The Government’s proposed schematics attached to its June 3, 2019 Notice of Proposal for Digital Presentation at Trial (ECF 101) should be denied, because they do not reflect the proposal offered at the Pretrial Hearing on November 19, 2018.

At the pretrial hearing, Government attorney Nanette Davis indicated the Government would install monitors for every other juror. (*See* Tr. Pretrial Hearing 11/19/18, 81–82.) The schematics attached as Exhibit 1 to the Government Motion indicate there will be two awkwardly placed monitors that the jurors can look to. This does not satisfy this Court’s concern that each person receive a monitor. (*See id.* at 81.)

If the Government will install monitors for every other juror as indicated at the pretrial hearing, then the defense does not object to the use of a digital presentation.

Defendant requests that the Court order the Government to provide monitors for every other juror, or deny the Government’s Notice.

Respectfully submitted on June   , 2019

MINNS & ARNETT

/s/ Michael Louis Minns

Michael Louis Minns  
State Bar No. 14184300  
mike@minnslaw.com

Ashley Blair Arnett  
State Bar No. 24064833  
ashley@minnslaw.com

9119 S. Gessner, Suite 1  
Houston, Texas 77074

Telephone: (713) 777-0772

Telecopy: (713) 777-0453

***Attorneys for Jack Stephen Pursley***

### **CERTIFICATE OF SERVICE**

This is to certify that on this      day of June, 2019, a true and correct copy of the above and foregoing instrument was served upon all counsel of record.

/s/ Ashley Blair Arnett

Ashley Blair Arnett